

Exhibit 1

Case Docket Entries

CC-40-2023-C-147

Court: **Circuit** County: **40 - Putnam** Created Date: **10/19/2023** Security Level: **Public**
 Judge: **Joseph Reeder** Case Type: **Civil** Case Sub-Type: **Other** Status: **Open**
 Related Cases:
 Style: **Kenneth Eldridge v. Appalachian Power Company**

A TRUE COPY
 TESTE: *Stephanie Smith FRK*
 CIRCUIT COURT PUTNAM COUNTY, WV *go*

	<u>Entered Date</u>	<u>Event</u>	<u>Ref. Code</u>	<u>Description</u>
1	10/19/2023 1:58:10 PM	E-Filed		Complaint
	1-1 10/19/2023	Civil Case Information Statement		
	1-2 10/19/2023	Supporting Document - Civil Case Information Statement		
	1-3 10/19/2023	Complaint - Complaint		
	1-4 10/19/2023	Transmittal		
	1-5 10/19/2023	Summons		
2	10/19/2023 1:58:10 PM	Judge Assigned	J-40001	Joseph Reeder
3	10/19/2023 1:58:10 PM	Party Added	P-001	Kenneth Eldridge
4	10/19/2023 1:58:10 PM	Party Added	D-001	Appalachian Power Company
5	10/19/2023 1:58:10 PM	Party Added	D-002	Babcock & Wilcox Construction Co., LLC
6	10/19/2023 1:58:10 PM	Party Added	D-003	Enerfab, LLC
7	10/19/2023 1:58:10 PM	Party Added	D-004	Enerfab Process Solutions & Fabricated Products, Inc.
8	10/19/2023 1:58:10 PM	Party Added	D-005	Enerfab Power & Industrial, LLC
9	10/19/2023 1:58:10 PM	Attorney Listed	P-001	A-10593 - Jason Patrick Foster
10	10/19/2023 1:58:10 PM	Service Requested	D-001	Filer - Secretary of State
11	10/19/2023 1:58:10 PM	Service Requested	D-002	Filer - Secretary of State
12	10/19/2023 1:58:10 PM	Service Requested	D-003	Filer - Secretary of State
13	10/19/2023 1:58:10 PM	Service Requested	D-004	Filer - Secretary of State
14	10/19/2023 1:58:10 PM	Service Requested	D-005	Filer - Secretary of State
15	11/2/2023 9:40:42 AM	E-Docketed		Supporting Documents - WV SOS ACCEPTS SERVICE/APPALCHIAN POWER COMPANY/10-26-23
	15-1 11/2/2023	Supporting Document - WV SOS ACCEPTS SERVICE/APPALCHIAN POWER COMPANY/10-26-23		
	15-2 11/2/2023	Transmittal		
16	11/2/2023 9:53:34 AM	E-Docketed		Supporting Documents - WV SOS ACCEPTS SERVICE/BABCOCK & WILCOX/10-26-23
	16-1 11/2/2023	Supporting Document - WV SOS ACCEPTS SERVICE/BABCOCK & WILCOX/10-26-23		
	16-2 11/2/2023	Transmittal		
17	11/2/2023 9:55:02 AM	E-Docketed		Supporting Documents - WV SOS ACCEPTS SERVICE/ENERFAB/10-26-23
	17-1 11/2/2023	Supporting Document - WV SOS ACCEPTS SERVICE/ENERFAB/10-26-23		
	17-2 11/2/2023	Transmittal		
18	11/2/2023 9:55:58 AM	E-Docketed		Supporting Documents - WV SOS ACCEPTS SERVICE/ENERFAB PROCESS SOLUTIONS/10-26-23
	18-1 11/2/2023	Supporting Document - WV SOS ACCEPTS SERVICE/ENERFAB PROCESS SOLUTIONS/10-26-23		
	18-2 11/2/2023	Transmittal		
19	11/2/2023 9:57:56 AM	E-Docketed		Supporting Documents - WV SOS ACCEPTS SERVICE/ENERFAB POWER & INDUSTRIAL/10-26-23
	19-1 11/2/2023	Supporting Document - WV SOS ACCEPTS SERVICE/ENERFAB POWER & INDUSTRIAL/10-26-23		
	19-2 11/2/2023	Transmittal		

IN THE CIRCUIT COURT OF PUTNAM COUNTY, WEST VIRGINIA

KENNETH ELDRIDGE,

Plaintiff,

v.

Civil Action No. 23-C-

**APPALACHIAN POWER COMPANY,
A Virginia Corporation,
BABCOCK & WILCOX
CONSTRUCTION CO., LLC, a
Delaware Limited Liability Company,
ENERFAB, LLC, an Ohio Limited
Liability Company, ENERFAB PROCESS
& FABRICATED PRODUCTS, INC., an
Ohio Corporation, and ENERFAB POWER
& INDUSTRIAL, LLC, an Ohio Limited
Liability Company,**

Defendants.

COMPLAINT

COMES NOW Plaintiff and for his Complaint, alleges as follows:

I. PARTIES

1. Plaintiff, Kenneth Eldridge, at all times relevant to this Complaint, resided at 695 Pleasant Hill Road, Greenup, Greenup County, Kentucky.

2. Defendant Appalachian Power Company ("APC"), at all times relevant to this Complaint, was and is a Virginia corporation located in Henrico County, Virginia, with a registered office address of 4701 Cox Road, Suite 285, Glen Allen, Virginia.

3. Defendant Babcock & Wilcox Construction Co., LLC ("B&W"), at all times relevant to this Complaint, was and is a Delaware limited liability company with its principal place of business located at 1200 East Market Street, Suite 650, Akron, Summit County, Ohio.

4. Defendant Enerfab, LLC (“Enerfab LLC”), at all times relevant to this Complaint, was and is an Ohio limited liability company with its principal place of business located at 4430 Chickering Ave, Cincinnati, Ohio, 45232.

5. Enerfab Power & Industrial, LLC (“Enerfab Power”), at all times relevant to this Complaint, was and is an Ohio limited liability company with its principal place of business located at 4430 Chickering Ave, Cincinnati, Ohio, 45232.

6. Defendant Enerfab Process Solutions & Fabricated Products, Inc. (“Enerfab Process”), at all times relevant to this Complaint, was and is an Ohio corporation with its principal place of business located at 4955 Spring Grove, 430 Cincinnati, Ohio, 45232. Enerfab LLC, Enerfab Power, and Enerfab Process are collectively referred to as “Enerfab.” Plaintiff has included three entities as there is insufficient evidence regarding which entity employed to the workers who are responsible for Plaintiff’s injuries.

II. JURISDICTION AND VENUE

7. The Court has subject-matter jurisdiction over this action pursuant to W. Va. Const. art. VIII, § 6, and W. Va. Code § 51-2-2.

8. Defendants are subject to personal jurisdiction of this Court under W. Va. Code § 56-3-33(a)(3) by virtue of their tortious acts and/or omissions in the State of West Virginia which were the direct and proximate cause of Plaintiff’s injuries.

9. Venue in this Court is proper pursuant to W. Va. Code § 56-1-1, in that Plaintiff’s causes of action arose in Putnam County, West Virginia.

III. ALLEGATIONS COMMON TO ALL COUNTS

10. Plaintiff was, at all times relevant to this Complaint, employed by Structsure Scaffold Solutions, LLC (“Structsure”).

11. Upon information and belief, APC owns and operates the John Amos Power Plant located at 1530 Winfield Road, Winfield, Putnam County, West Virginia (the “Plant”).

12. At some point prior to March 18, 2022, APC contracted with B&W and Enerfab to perform a power plant bottom ash retrofit project (the “Retrofit Project”).

13. At some point prior to March 18, 2022, APC also contracted with Structsure to erect scaffolding (the “Scaffolding Project”) inside of the boiler located at Unit 3 (the “Boiler”).

14. On March 18, 2022, employees of B&W and/or Enerfab were performing welding operations associated with the Retrofit Project (the “Welding Operations”) in the Plant’s ash pit outside of the Boiler.

15. Additionally, B&W and/or Enerfab were conducting Welding Operations on the outside of the four doors of the Boiler.

16. At times the doors were open allowing welding fumes to fill the Boiler.

17. At the same time, Plaintiff was inside the Boiler working on setting scaffolding located at the bottom of the Boiler in conjunction with the Scaffolding Project.

18. While warning indicators related to the Welding Operations were placed outside of the Boiler, no warning were placed either at the ingress to the Boiler or inside the Boiler.

19. The area of the Boiler where Plaintiff was working was filled with smoke from the Welding Operations which resulted in Plaintiff suffering a severe headache and abdominal pain.

20. None of the Defendants provided Plaintiff with any notice or warning that Welding Operations would be conducted on the Boiler doors or that Plaintiff would be exposed to welding fumes.

21. When Plaintiff finally exited the Boiler, he encountered a welder in full protective gear, including a breathing protection apparatus, in the vicinity of the Boiler. At no time was Plaintiff provided a respirator or warned that the welding fumes were hazardous.

22. Plaintiff's stomach pain became so severe that on March 21, 2022, he went to an urgent care facility and was sent to the Emergency Department for testing, where he underwent a CT-scan which revealed a lobar pneumonia of the lower lobe of Plaintiff's left lung.

23. After his symptoms did not improve, Plaintiff went to his Primary Care Physician who sent him to the Emergency Room due to decreased oxygen levels on March 25, 2022. A second CT-scan revealed a diffuse multi-level lobar infiltrate that is most consistent with diffuse alveolar interstitial infiltrate, indicating an acute lung injury resulting in admission to Southern Ohio Medical Center.

24. Additionally, Plaintiff's treating pulmonologist, Dr. Eli Saab, MD, FCCP, has confirmed that, to a reasonable degree of medical certainty, Plaintiff had an occupational exposure that resulted in an acute lung injury.

COUNT I- NEGLIGENCE
(Defendant APC)

25. Plaintiff incorporates all allegations above the same as if fully restated and re-alleged and Plaintiff further complains and says as follows:

26. At all times relevant to this action, APC owned and operated the Plant.

27. As the owner and operator of the Plant, APC owed Plaintiff the duty of providing him with a reasonably safe place to work and the duty to exercise ordinary care for Plaintiff's safety.

28. Upon information and belief, APC's officers, employees and/or agents knew or reasonably should have known that both the Retrofit Project and the Scaffolding Project were being conducted simultaneously and in close proximity to each other.

29. Upon information and belief, APC's officers, employees and/or agents maintained a regular presence at the Plant, observed and/or, through the exercise of reasonable diligence, should have observed the unsafe conditions caused by the Welding Operations on the workers performing the Scaffolding Project yet permitted such unsafe working conditions to persist at the Plant.

30. APC's acts and/or failures to act directly and proximately caused Plaintiff's injuries and damages.

COUNT II- PREMISES LIABILITY
(Defendant APC)

31. Plaintiff incorporates all allegations above the same as if fully restated and re-alleged and Plaintiff further complains and says as follows:

32. At all times relevant to this action, APC owned the Plant.

33. At all times relevant to this civil action, Plaintiff had explicit authorization from APC to enter upon the Plant in conjunction with the Scaffolding Project.

34. As the owner of the Plant, APC owed Plaintiff a duty of reasonable care under the applicable circumstances, including, but not limited to, the coordination of all work occurring at the Plant, including the Retrofit Project and the Scaffolding Project.

35. This coordination included, but was not limited to, scheduling work in such a way that the hazards associated with one project did not present a risk of harm to persons, such as Plaintiff, performing work on another project.

36. Plaintiff suffered injuries as a result of the inhalation of dangerous amounts of welding fumes generated by the Welding Operation.

37. A worker's inhalation of harmful gases generated by the Welding Operation by workers on the Scaffolding Project was foreseeable to APC because APC approved, scheduled and coordinated both the Retrofit Project and the Scaffolding Project.

38. Prior to March 18, 2022, APC had actual knowledge that inhalation of the welding fumes could be injurious to the health of people working in the vicinity of the Welding Operations.

39. The magnitude of the burden on APC to guard against injury was slight. Had APC conducted a reasonable review of the work being conducted at the Plant on March 18, 2022, APC could have simply scheduled the Scaffolding Project to commence after the completion of the Welding Operations or vice versa.

40. The magnitude of the burden on APC to guard against injury was also slight because APC could have also warned workers, such as Plaintiff, of the risks associated with the fumes from the Welding Operations so that workers could take appropriate protective measures.

41. APC breached its duty of reasonable care to Plaintiff under the circumstances of this case by failing to reasonably coordinate the work associated with the Retrofit Project and the Scaffolding Project and by failing to warn Plaintiff of the dangers associated with the Welding Operations.

42. APC's acts and/or failures to act directly and proximately caused Plaintiff's injuries and damages.

COUNT III- NEGLIGENCE
(Defendants B&W and Enerfab)

43. Plaintiff incorporates all allegations above the same as if fully restated and re-alleged and Plaintiff further complains and says as follows:

44. At all times relevant to this action, B&P and/or Enerfab were responsible for the Welding Operations at the Plant.

45. As the entity in control of the Welding Operations, B&W and/or Enerfab failed to exercise ordinary care for Plaintiff's safety.

46. Additionally, the Welding Operations were, upon information and belief, in violation of, but not limited to: 29 CFR 1926.1126; industry standards; and safety rules regarding the proper precautions, warnings and monitoring associated with activities such as the Welding Operation.

47. Notwithstanding the existence of the facts and circumstances set forth in the preceding paragraphs, B&W and/or Enerfab, acting by and through their officers, employees and/or agents, nevertheless intentionally exposed Plaintiff to hazardous welding fumes which caused permanent injury. Decedent to the aforementioned specific unsafe working conditions.

48. B&W's acts and/or failures to act directly and proximately caused Plaintiff's injuries and damages.

IV. RELIEF REQUESTED

WHEREFORE, Plaintiff demands judgment against Defendants for damages as follows:

- a. Medical and hospital bills for diagnostic and preventative treatment and therapies and for treatment of injuries, both past and future;
- b. Physical injuries, both temporary and permanent;
- c. Severe and significant emotional distress, and mental pain and suffering, both temporary and permanent;
- d. Fear, humiliation, and embarrassment, past and future;
- e. Annoyance and inconvenience, past and future;
- f. Loss of physical health and well-being, past and future;

- g. Loss of enjoyment of life, past and future;
- h. Loss of income and/or earning capacity, past and future;
- i. Loss of value of employment benefits, including, but not limited to, loss of value of pension/retirement benefits;
- j. Disability;
- k. Compensatory damages;
- l. Punitive and exemplary damages;
- m. Civil penalties;
- n. Attorney's fees and costs;
- o. Pre- and post-judgment interest;
- p. All statutory, common-law, and equitable relief to which Plaintiff may be entitled; and
- q. Such other and further relief as justice requires.

V. Jury Demand

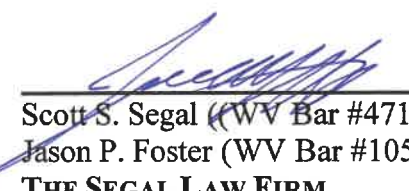
Plaintiff hereby demands a trial by jury upon all issues raised herein triable by jury.

Respectfully submitted,

KENNETH ELDRIDGE,

Plaintiff,

By counsel:



Scott S. Segal (WV Bar #4717)
Jason P. Foster (WV Bar #10593)
THE SEGAL LAW FIRM
A Legal Corporation
810 Kanawha Boulevard, East

Charleston, West Virginia 25301
Telephone: (304) 344-9100
Facsimile: (304) 344-9105

IN THE CIRCUIT COURT OF PUTNAM COUNTY, WEST VIRGINIA
Kenneth Eldridge v. Appalachian Power Company

Service Type: Filer - Secretary of State

NOTICE TO: Appalachian Power Company, C T Corporation System, 5098 Washington St W Ste 407, Charleston, WV 25313
THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY:

Jason Foster, 810 Kanawha Boulevard, East, Charleston, WV 25301

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

SERVICE:

10/19/2023 1:58:07 PM
Date

/s/ Stephanie M. Smith
Clerk

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on _____

☐ I certify that I personally delivered a copy of the Summons and Complaint to _____

☐ I certify that I personally delivered a copy of the Summons and Complaint to the individual's dwelling place or usual place of abode to _____, a member of the individual's family who is above the age of sixteen (16) years and by advising such person of the purpose of the summons and complaint.

☐ Not Found in Bailiwick

Date

Server's Signature

IN THE CIRCUIT COURT OF PUTNAM COUNTY, WEST VIRGINIA
Kenneth Eldridge v. Appalachian Power Company

Service Type: Filer - Secretary of State

NOTICE TO: Babcock & Wilcox Construction Co., LLC, United Agent Group, Inc., 126 East Burke Street, Martinsburg, WV 25401
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IN THE CIRCUIT COURT OF PUTNAM COUNTY, WEST VIRGINIA
Kenneth Eldridge v. Appalachian Power Company

Service Type: Filer - Secretary of State

NOTICE TO: Enerfab, LLC, Corporation Service Company, 209 West Washington Street, Charleston, WV 25302

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